

U.S. DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

ERIC BERNARD (#r-25398), a/k/a TERRELL KING,

Plaintiff,

v.

ILLINOIS DEPARTMENT OF CORRECTIONS and
WEXFORD HEALTH SOURCES, INC.,

Defendants.

No. 20cv50412

Hon. Iain D. Johnston
Hon. Margaret J. Schneider

ERIC BERNARD (#R-25398), a/k/a TERRELL KING,

Plaintiff,

v.

ROB JEFFRIES, ANDREA TACK, SONJA
NICKLAUS, JOHN VARGA, ANN GRANGER,
WEXFORD HEALTH SOURCES, INC., MONICA
CARPENTER, CELIA GROSSMAN, LACI BARLO,
UNKNOWN IDOC OFFICIALS and UNKNOWN
MEDICAL STAFF DEFENDANTS,

Defendants.

No. 20cv50413

Hon. Iain D. Johnston
Hon. Margaret J. Schneider

JOINT DISCOVERY STATUS REPORT

1. The above-captioned cases have been consolidated for discovery purposes, and the joint discovery report is intended to apply toward both cases. *See e.g.*, Case No. 20-cv-50412, at [ECF #154].
2. Counsel for all parties are currently working to schedule depositions in this matter, including Plaintiff's deposition. Plaintiff's deposition has been scheduled for April 9, 2024, at 9 a.m.
3. Additional depositions are anticipated following Plaintiff's deposition. Plaintiff's counsel will notice depositions for the individual defendants after defense counsel provides available dates.
4. On March 29, 2023 Plaintiff served Requests for Production and Interrogatories to all Defendants.
5. On January 19, 2024, Plaintiff's Counsel contacted Defendant IDOC and the individual IDOC defendants counsel, noting that responses had not been received. At that time Assistant

Attorney General Demetrios Karabetsos informed Plaintiff's counsel that the Attorney General's Office could not locate the discovery documents and requested that they be mailed. Further, Attorney Karabetsos informed Plaintiff's counsel that Assistant Attorney General Sergio Navarrete would be taking over both cases.

6. On March 7, 2024, Attorney Navarrete requested a two week extension for IDOC to respond to Plaintiff's discovery requests, and again requested another two week extension on March 28, 2024, with a goal to respond by April 15, 2024 at the latest. Plaintiff's counsel agreed to both extensions.
7. Fact discovery is currently set to close August 14, 2024.
8. The parties continue to work amicably to complete outstanding discovery goals.

Respectfully submitted,

CASSIDAY SCHADE, LLP

By: /s/ Joseph M. Ranvestel

One of the Attorneys for Defendants, WEXFORD
HEALTH SOURCES, INC., CECILIA
GROSSMAN, LACI BARLOW, DR. MELISSA
YOUNG, AMI WATSON, AND DR. MIRELLA
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/s/ Maria Makar (with permission)

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CERTIFICATE OF SERVICE

I hereby certify that on March 29, 2024, I electronically filed the foregoing document with the clerk of the court for Northern District of Illinois, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of E-Filing” to the attorneys of record in this case.

/s/Joseph M. Ranvestel

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